## BEFORE THE FEDERAL MARITIME COMMISSION

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BALTIC AUTO SHIPPING, INC.	·)
COMPLAINANT,	) ) )
v.	) )
	) DOCKET NO. 14-16
MICHAEL HITRINOV a/k/a MICHAEL KHITRINOV, EMPIRE UNITED LINES CO., INC.,	) ) ) )
RESPONDENTS.	) )
	)

## RESPONDENTS' MOTION FOR AN ORDER TO PRODUCE "EXHIBIT 'H'" OF THE COMPLAINANT'S AUDIT IN EXCEL FORMAT – ITS "NATIVE FORMAT"

The Respondents Michael Hitrinov and Empire United Lines Co., Inc., by and through their attorneys, The Law Office of Doyle & Doyle, hereby move for an Order requiring the Complainant to provide Exhibit "H" of its audit in native format, as required by Federal Rules of Civil Procedure, so that a reliable version can be duly searched. This Motion is supported by the accompanying Memorandum.

Dated this 2nd day of April 2015

THE LAW OFFICE OF DOYLE & DOYLE

Attorneys for Respondents

By: / LU | Separate S. Doyle, Jr.

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## **CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the RESPONDENTS' MOTION FOR AN ORDER TO PRODUCE "EXHIBIT 'H" OF THE COMPLAINANT'S AUDIT IN EXCEL FORMAT—ITS "NATIVE FORMAT" upon Complainant's counsel, Marcus A. Nussbaum, Esq., with the address of P.O. Box 245599, Brooklyn, NY 11224 by first class mail, postage prepaid, and by email (marcus.nussbaum@gmail.com); and that the original and five (5) copies are being filed with the Secretary of the Federal Maritime Commission.

Gerard S. Dovle, Jr.

THE LAW OFFICE OF DOYLE & DOYLE

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Attorneys for Respondents
Michael Hitrinov, a/k/a
Michael Khitrinov, and
Empire United Lines, Co., Inc.

Dated in Short Hills, NJ this 2nd day of April, 2015.